

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**[PROPOSED] ORDER GRANTING TRUSTEE’S THIRTIETH OMNIBUS MOTION TO
DISALLOW CLAIMS AND OVERRULE OBJECTIONS OF CLAIMANTS WHO HAVE
NO NET EQUITY**

Upon consideration of the motion (the “Motion”) [Docket No. ____], by Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the chapter 7 estate of Bernard L. Madoff (“Madoff”) (collectively, “Debtor”), in the above-captioned SIPA liquidation proceeding seeking to have the Court disallow any and all claims and overrule objections filed by or on behalf of customers that withdrew more money from BLMIS than they deposited and are thus, in the parlance of this case, net winners, or by customers that withdrew an equal amount to what was deposited and are thus, in the parlance of this case, net zeros (collectively, the “Claimants”); and the Claims¹ to be disallowed and Objections to be overruled are identified in Exhibit A to the Declaration of

¹ All capitalized terms not defined herein shall have the meaning ascribed in the Motion.

Vineet Sehgal in Support of the Motion (the “Sehgal Declaration”), [Docket No. __]; and due and proper notice of the Motion having been given and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion as set forth herein is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Motion is granted to the extent provided herein; and it is further

ORDERED that the Claims listed on Exhibit A hereto under the heading “Claims and Objections,” are disallowed and the Trustee’s Claims determinations are affirmed; and it is further

ORDERED that the Objections listed on Exhibit A hereto under the heading “Claims and Objections,” are overruled; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2019
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

IN RE: BLMIS. CASE NO: 08-01789 (SMB)

THIRTIETH OMNIBUS MOTION: EXHIBIT A – CLAIMS AND OBJECTIONS

Objection Party	Claim Number	Objection To Determination Docket Number	Counsel	Account Name	Account Number
Delia Gail Rosenberg	011095	2509	Milberg LLP	Delia Gail Rosenberg	1R0250
Diana Melton Trust, Dated 12/5/05	008648	874	Kachroo Legal Services	Diana Melton Trust DTD 12/5/05	1ZA699
Diane Sloves as Tstee Under Rev Tst Agreement Dtd 10/13/00 for the Benefit of D Sloves	009122	2409	Milberg LLP	Diane Sloves as TSTEE Under Rev Tst Agreement DTD 10/13/00	1S0274
Jerry Guberman Trust Dated 12/23/93	009416	711	Milberg LLP	Jerry Guberman as Trustee for Jerry Guberman	1ZA407
Michael Mathias and Stacey Mathias JT WROS	002619	2963	Milberg LLP	Michael Mathias & Stacey Mathias J/T WROS	1M0100
NTC & Co. FBO Leila F Sobin	006479	829	Milberg LLP / Seeger Weiss LLP	Millennium Trust Company, LLC FBO Leila F Sobin (111966)	1S0457
Trudy Schlachter	011044	915	Milberg LLP / Seeger Weiss LLP	Trudy Schlachter	1S0293